

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIKKO D'AMBROSIO,)
Plaintiff,)
v.) Case No. 24 - cv - 678
)
META PLATFORMS, INC., *et al.*,) Hon. Sunil R. Harjani
Defendants.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO AMEND OR OTHERWISE RESPOND**

The Plaintiff, Nikko D'Ambrosio, by and through undersigned counsel, brings this Unopposed Motion for Extension of Time to Amend his pleading or otherwise respond to Defendant Meta Platforms, Inc ("Meta")'s Motion to Dismiss First Amended Complaint (Dkt. # 38) and Defendants Spill the Tea, Inc., Paola Sanchez, and Blake Millbrand's Motion to Dismiss the First Amended Complaint (Dkt. # 47), and in support thereof, states as follows:

1. Meta filed its Motion to Dismiss First Amended Complaint on August 21, 2024, which remains pending and undetermined before this Court.
2. On August 22, 2024, The Court entered an Order (Dkt. # 40) providing Plaintiff 21 days to amend his First Amended Complaint or otherwise respond to Meta's Motion to Dismiss.
3. On August 28, 2024, Defendants Spill The Tea, Inc., Paola Sanchez, and Blake Millbrand filed a Motion to Dismiss the First Amended Complaint.
4. On August 30, 2024, the Court entered an Order (Dkt. # 48) providing Plaintiff 21 days to amend his First Amended Complaint or otherwise respond to Defendants Spill The Tea, Sanchez, and Millbrand's Motion to Dismiss the First Amended Complaint.

6. Plaintiff seeks an additional 28 days to amend his Complaint or otherwise respond to the two pending Motions to Dismiss. Plaintiff is permitted 21 days to amend his pleading as a matter of course upon receiving an Answer or Motion to Dismiss pursuant to Fed. R. Civ. P. 15(a)(1)(B).

7. This Court has granted Plaintiff no prior extensions of time with respect to Meta's Motion to Dismiss or Spill The Tea, Sanchez, and Millbrand's Motion to Dismiss. This request is brought in good faith and not for the purposes of delay. No prejudice will result if Plaintiff's request for an extension of time is granted.

8. This Court has granted each Defendant additional time to answer or otherwise plead to Plaintiff's First Amended Complaint, and equity suggests that Plaintiff be permitted a similar extension.

9. Plaintiff has conferred with counsel for each Defendant regarding objections to the instant Motion, and counsel for each Defendant has represented that this Motion is unopposed.

WHEREFORE, the Plaintiff, Nikko D'Ambrosio, respectfully requests this Honorable Court enter an Order:

- a. Granting Plaintiff an additional 28 days to amend his First Amended Complaint or otherwise respond to the two pending Motions to Dismiss, or until October 11, 2024; and
- b. Any such other and further relief this Court deems equitable and just.

Respectfully submitted,

/s/Marc P. Trent

Attorney for Plaintiff

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